

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE:) CHAPTER 13
)
SANDRA VENTRONE) CASE NO. 15-52886
)
Debtor) JUDGE ALAN M. KOSCHIK
)
) **MOTION TO DEEM MORTGAGE**
) **CURRENT**

Now comes the Debtor, Sandra Ventrone, by and through the undersigned counsel, and moves the Court for an order deeming Debtor's mortgage with Seterus current. A dispute has arisen between Debtor and Seterus concerning the status of Debtor's mortgage. Debtor says she is current and has never missed a payment on her mortgage.

WHEREFORE, Debtor prays the Court issue an order deeming the subject mortgage current and that the subject case be kept open until resolution of this motion.

Respectfully submitted by,

/s/ Robert W. Heydorn

Robert W. Heydorn, Attorney for Debtor
Ohio Reg. No. 0000898
Hoover, Heydorn & Herrnstein Co., LPA
111 Stow Avenue, Suite 100
Cuyahoga Falls, OH 44221
Phone: 330-929-2676
Fax: 330-929-7963
Email: bobheydorn@hotmail.com

NOTICE

Pursuant to LBR9013-3 Notice is hereby given that any response or objection must be filed within TWENTY-ONE (21) days, or such other time as specified by

applicable Federal Rule of Bankruptcy Procedure or statute or as the Court may order, from the date of service set forth on the certificate of service, if relief sought is opposed, and that the Court is authorized to grant the relief requested without further notice unless a timely objection is filed.

NOTICE OF DEBTOR'S MOTION DEEMING MORTGAGE CURRENT

Debtor has filed papers with the Court as stated above.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you wish to object to the Court sustaining Debtors' objection without holding a hearing, or if you want the Court to consider your views on the objection, then on or before **September 30, 2018** you, or your attorney, must:

- ❖ File, with the Court, a written request for a hearing, and a written response setting forth the specific grounds explaining your position at:

Clerk, U.S. Bankruptcy Court
Northern District of Ohio
2 South Main Street
Akron, OH 44308

If you mail your Objection to the court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

- ❖ Mail a copy to:

Robert W. Heydorn, Esq.
111 Stow Avenue, Suite 100
Cuyahoga Falls, OH 44221

Keith L. Rucinski, Trustee
One Cascade Plaza, Suite 2020
Akron, OH 44308

If you, or your attorney, do not take these steps, the Court may decide that you do not oppose the Debtor's motion and may enter an order granting that motion.

Date: September 8, 2018

Signature: /s/ Robert W. Heydorn
Robert W. Heydorn, Attorney for Debtor

CERTIFICATE OF SERVICE

I certify that on September 8, 2018, a true and correct copy of the foregoing Motion was served:

Via the Court's Electronic Case Filing System to these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Keith L. Rucinski, Chapter 13 Trustee at krucinski@ecf.epiqsystems.com,
efilings@ch13akron.com

Office of the U.S. Trustee at registered.address@usdoj.gov

And by regular US mail, postage prepaid, on:

Sandra Ventrone
319 Ellen Avenue
Akron, OH 44305

Seterus
PO Box 1077
Hartford, CT 06143-1077

Federal National Mortgage Association
c/o Edward Bailey, Attorney for Creditor
30455 Solon Road
Solon, OH 44139

/s/ Robert W. Heydorn

Robert W. Heydorn, Attorney for Debtor
Ohio Reg. No. 0000898
Hoover, Heydorn & Herrnstein Co., LPA
111 Stow Avenue, Suite 100
Cuyahoga Falls, OH 44221
Phone: 330-929-2676
Fax: 330-929-7963